

*McClay•Alton, P.L.L.P.  
Robert M. McClay #69620  
(Pro Hac Vice)  
951 Grand Avenue  
St. Paul, Minnesota 55101  
Telephone: 651-290-0301  
Fax: 651-290-2502  
Email: [law@mcclay-alton.com](mailto:law@mcclay-alton.com)*

*Marvin C. Ingber #0048859  
(Pro Hac Vice)  
Attorney and Counselor at Law  
6705 Apache Road  
Edina, Minnesota 55439-1001  
Telephone: 612-327-8378  
Email: [mcingber@comcast.net](mailto:mcingber@comcast.net)*

*Attorneys for Defendants:  
IRVING J. PINTO 1996 GRANTOR RETAINED  
ANNUITY TRUST; IRVING J. PINTO 1994  
GRANTOR RETAINED ANNUITY TRUST;  
SIDNEY KAPLAN, in his/her capacity as Trustee  
of the Irving J. Pinto 1996 Grantor Retained  
Annuity Trust and the Irving J. Pinto 1994  
Grantor Retained Annuity Trust; ESTATE OF IRVING  
J.PINTO; and JAMIE PINTO, in his capacity as  
Personal Representative of the Estate of Irving J. Pinto.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.	
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,	
Plaintiff,	Adv. Pro. No. 10-04744 (SMB)
v.	
IRVING J. PINTO 1996 GRANTOR RETAINED ANNUITY TRUST; IRVING J. PINTO 1994 GRANTOR RETAINED ANNUITY TRUST; SIDNEY KAPLAN, in his/her capacity as Trustee of the Irving J. Pinto 1996 Grantor Retained Annuity Trust and the Irving J. Pinto 1994 Grantor Retained Annuity Trust; ESTATE OF IRVING J.PINTO; and JAMIE PINTO, in his capacity as Personal Representative of the Estate of Irving J. Pinto,	
Defendants.	

**CERTIFICATE OF SERVICE**

1. I am an attorney admitted to practice Pro Hac Vice before this Court.
2. On April 22, 2015, the documents listed below were filed electronically via the Court's CM/ECF System.
  1. **Motion of Defendants' Counsel Robert M. McClay at the Law Firm of McClay-Alton, P.L.L.P. and Defendants' Counsel Marvin C. Ingber for an Order Pursuant to Rule 2090-1(e) of the Local Bankruptcy Rules to Remove Bruce S. Schaeffer as Counsel to Defendants for Adv. Pro. No. 10-04744 (SMB);**
  2. **Declaration of Robert M. McClay;**
  3. **Declaration of Marvin C. Ingber;**
  4. **Affidavit of Jamie Pinto;**
  5. **Notice of Presentment; and,**
  6. **Proposed Order.**
3. Electronic notice of the filing of the above-mentioned documents was provided via the Court's CM/ECF System to all parties able to receive electronic notice, as indicated in the Notice of Electronic Filing. Such parties may access the documents through the Court's CM/ECF System.
4. Copies of the documents were also served on April 22, 2015 via USPS First Class Mail, postage prepaid, return service requested to those parties listed on the

attached Service List.

I declare, pursuant to USC Title 28 § 1746, under penalty of perjury that the foregoing is true and correct.

Dated: St. Paul, Minnesota

April 22, 2015

By: /s/ Robert M. McClay  
Robert M. McClay

**SERVICE LIST**

Bruce S. Schaeffer, Esq.  
Attorney at Law  
3 Park Avenue Suite 1501  
New York, NY 10016

Jamie Pinto  
[Mailing address  
intentionally omitted for privacy reasons]

Marc E. Hirschfield, Esq.  
Baker & Hostetler LLP  
45 Rockefeller Plaza  
New York, NY 10111

Dean D. Hunt, Esq.  
Farrell A. Hochmuth, Esq.  
Baker & Hostetler LLP  
1000 Louisiana Suite 2000  
Houston, Texas 77002-5009

Kevin H. Bell, Esq.  
Securities Investor Protection Corporation  
805 15th Street, N.W., Suite 800  
Washington, D.C. 20005